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December 26, 2017

**VIA ECF**

Honorable LaShann DeArcy Hall  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: James Stewart v. Portfolio Recovery Associates, LLC  
Case No. 1:17-cv-04512-LDH-JO (and consolidated cases - Nos. 1:17-cv-05066-SJ-SMG; 1:17-cv-05120-FB-VMS; 1:17-cv-05617-DLI-CLP)  
Letter Request to Adjourn Dispositive Motion Deadline**

Your Honor:

This firm represents Defendant Portfolio Recovery Associates, LLC ("PRA") in the above referenced matter. In accordance with Your Honor's individual practices, PRA respectfully submits this letter request to adjourn the dispositive motion date set forth in the August 11, 2017, scheduling order. In support of its request, PRA states the following:

1. Per this Court's scheduling order and Your Honor's individual practices, the deadline by which to submit pre-motion letter requests on dispositive motions is currently set for January 3, 2018;
2. Certain events have occurred over the past week that have altered the procedural posture of this case which impact the original dispositive motion deadline:
  - a. This Court granted PRA's letter request for a pre-motion conference to submit a motion to dismiss and motion to stay this matter (see Docket entries dated Dec. 15 and 21, 2017);
  - b. The pre-motion conference is currently set for January 5, 2018, two days after the dispositive motion deadline (*Id.*); and
  - c. This Court granted PRA's motion to consolidate this matter with three other similar matters, two of which have not yet had initial conferences;
3. PRA has previously filed a request for an extension of time to file a responsive pleading and a request to adjourn the pre-trial conference;
4. The Court granted both of PRA's aforementioned requests;

5. Plaintiff consents to this request; and
6. The adjournment of the dispositive motion deadline may affect other scheduled dates. However, it is expected that the Court's forthcoming briefing schedule on PRA's motion to dismiss and/or motion to stay may also alter scheduled dates. Therefore, PRA respectfully requests the Court forego the requirement that the requesting party provide a proposed Revised Scheduling Order.

Given the recently-altered procedural posture of this case, and considering PRA's pending request to file a motion to dismiss, requiring the parties to file pre-letter requests for dispositive motions is premature in light of the upcoming conferences and potential briefing schedules. For these reasons, PRA respectfully requests this Court adjourn the January 3, 2018, dispositive motion deadline.

Finally, PRA also seeks confirmation that all other deadlines and appearances that were in place in the other matters filed by James Stewart prior to the consolidation are no longer applicable.

If Your Honor has any questions or concerns regarding this request, please do not hesitate to contact my office.

Respectfully submitted,

/s/ Stephen J. Steinlight  
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